

CIVIL SUIT NO: _____

JASON JACKSON * 9TH JUDICIAL DISTRICT COURT

VERSUS * PARISH OF RAPIDES

CIRCLE K STORES INC., * STATE OF LOUISIANA
RI CS1, LLC, CIRCLE K,
KINGSVILLE, and DENISE
HENDRICK

PETITION FOR DAMAGES

NOW INTO COURT comes plaintiff, JASON JACKSON, a resident of the Parish of Rapides, State of Louisiana, who respectfully presents the following:

1.

Made defendants are:

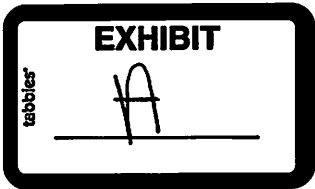
1. **CIRCLE K STORES INC.**, a foreign business authorized to do and doing business in the State of Louisiana, who may be served through its registered agent for service of process, Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, Louisiana 70802.
2. **RI CS1, LLC**, a domestic limited liability company licensed to do and actually doing business in the State of Louisiana, and which may be served through its registered agents of service, Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, Louisiana 70802
3. **CIRCLE K, KINGSVILLE**, who may be served at 3432 Highway 165, Pineville, Louisiana 71360
4. **DENISE HENDRICK**, Manager of Circle K, Kingsville, who may be served at 2888 Highway 28 East, Pineville, Louisiana 71360

2.

Defendants herein are individually, jointly and in solido responsible unto plaintiff for all damages enumerated herein. In addition, plaintiff is entitled to legal interest from the date of judicial demand and all costs of these proceedings.

3.

On or about March 23, 2021, plaintiff, JASON JACKSON, worked for Southwest Beverage Company, located in the City of Alexandria, the State of Louisiana.



4.

On or about March 23, 2021, plaintiff, **JASON JACKSON**, was in the cooler stocking shelves at the Circle K, #2843, convenience store, located in the City of Pineville, the State of Louisiana. While performing his duties, his foot became lodged under a dolly, causing him to fall as he turned to load product on a shelf.

5.

On or about March 23, 2021, **DENISE HENDRICK** was the store manager of the Circle K, convenience store, and was present in the store on the dates of plaintiff **JASON JACKSON** injury.

6.

The accident was caused by the negligence and fault of defendant, **CIRCLE K STORES INC. RI CSI, LLC, CIRCLE K, KINGSVILLE, and DENISE HENDRICK**, in the following particulars:

- a. Failure to exercise reasonable care to keep all areas of the store reasonably safe;
- b. Failure to implement reasonably safe floor and walk-in cooler cleaning procedures;
- c. Failure to warn plaintiff and/or customers of the existence of an unsafe area of the walk-in cooler in the store;
- d. Failure to make reasonable effort to keep the premises free of hazardous condition which might give rise to reasonably foreseeable damages;
- e. Failure to make periodic inspection of all areas within the store and the walk-in cooler to determine whether an unreasonable danger exists.
- f. Failure to properly store the empty wheeled furniture style dollies that were used for overflow stacks of product.

7.

As a result of the above-described accident, plaintiff **JASON JACKSON**, suffered injuries to his body and mind including his foot, leg, elbow.

8.

As a result of the above-described accident and related injuries, plaintiff, **JASON JACKSON** sustained the following damages:

- a. Physical pain and suffering (past and future);

- b. Mental pain and suffering (past and future);
- c. Loss of income and earning capacity (past and future);
- d. Medical bills (past and future);
- e. Loss of enjoyment of life (past and future); and
- f. Physical disability.

9.

Plaintiff claims damages from the defendant in an amount deemed reasonable in the premises to be determined by the finder of fact.

10.

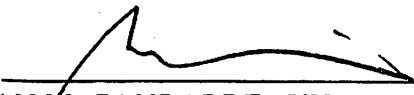
Attached are Interrogatories and Request for Production of Documents that are to be answered in accordance with the law.

WHEREFORE, plaintiff prays that his petition be filed and served upon defendants, ordering them to answer the allegations contained herein; that after legal delays and proceedings are complete, there be judgment in favor of plaintiff, **JASON JACKSON**, and against defendants, **CIRCLE K STORES INC., RI CS1, LLC, CIRCLE K, KINGSVILLE, and DENISE HENDRICK** for damages in an amount reasonable in the premises, together with legal interest from the date of this demand and for all costs of these proceedings.

Plaintiff further prays for all general and equitable relief.

Respectfully Submitted:

BRIAN CAUBARREAU & ASSOCIATES

BY: 
BRIAN M. CAUBARREAU, #21522
brian@caubarreaux.com
EUGENE A. LEDET, JR, #19681
genel@caubarreaux.com
ETHAN E. CAUBARREAU, #38694
ethan@caubarreaux.com
PATRICK B. SADLER, #32235
patrick@caubarreaux.com
JACOB R. CAUBARREAU, #39834
jacob@caubarreaux.com
PAUL J. TELLARICO, #19401
pault@caubarreaux.com
2204 MacArthur Drive
Alexandria, Louisiana 71301
Telephone: (318) 442-0900
Facsimile: (318) 483-9993

Attorneys for Plaintiff

SERVICE INFORMATION

CIRCLE K STORES INC.

Through its agent of service
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, Louisiana 70802

RI CS1, LLC

Through its agent of service
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, Louisiana 70802

SERVICE INFORMATION CONTINUED ON THE FOLLOWING PAGE

CIRCLE K, KINGSVILLE

3432 Highway 165
Pineville, Louisiana 71360

DENISE HENDRICK

2888 Highway 28 East
Pineville, Louisiana 71360